



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 22, 2014

BY ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Alex Yucel,
13 Cr. 834 (PKC)

Dear Judge Castel:

The Government writes on behalf of the parties respectfully to request a 30-day adjournment of the pretrial conference scheduled in the above-referenced case for August 27, 2014 at 2:00 p.m. As the Court is aware, discovery has been produced and the parties have been engaged in negotiations concerning a pretrial resolution of this case. The Government has extended a plea offer to the defendant, which offer is not scheduled to expire until after the scheduled conference. The Government has conferred with counsel for the defendant and he joins in this request. This is the parties' second request for an adjournment.

Furthermore, in the interests of justice, the Government respectfully requests that the time between August 27, 2014 through the date of the adjourned conference be excluded for speedy trial calculations, pursuant to 18 U.S.C. § 3161(h)(7)(A). The requested adjournment will permit the defendant additional time to consider the outstanding plea offer and for the parties to engage in further plea discussions, if necessary. The Government respectfully submits that the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and the defendant in a speedy trial. The Government has conferred with

Hon. P. Kevin Castel

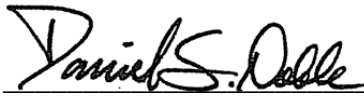
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defense counsel and he does not object to the exclusion of time on behalf of the defendant. A proposed order excluding time is attached for Your Honor's consideration.

Respectfully submitted,

PREET BHARARA
United States Attorney

By: 
Daniel S. Noble / Sarah Y. Lai
Assistant United States Attorneys
(212) 637-2239/-1944

Enclosure

cc: Bradley L. Henry, Esq. (via ECF and electronic mail)
Counsel for Alex Yucel